

Installation/Location: NAF El Centro
Partner: Lincoln Military Housing
Prepared by:

7-Oct-20

For Follow Up (out of compliance issues):

		Comments/ Responses
P	Permits	
	1 Applicable permits for location posted/ filed?	None.
AS	Arsenic	
	1 Does the property include any locations with suspected arsenic or incidents of arsenic exposure?	None.
	(a) Does the project include any CCA-treated lumber, such as decks or walkways?	Not applicable.
	(b) Is a procedure in place for identifying these locations prior to any work?	Not applicable.
	(c) Are the locations readily available to the Partner maintenance staff and contractors, especially landscaping?	Not applicable.
2	Is there an arsenic management plan or SOP for the property?	Not applicable.
	(a) Have arsenic management techniques been completed in accordance with the plan?	Not applicable.
3	What were the methods utilized by the Partner/contractor to minimize arsenic exposure?	Not applicable.
	(a) Did they utilize proper soil covering and cleaning techniques?	Not applicable.
4	Visit a recent excavation, landscaping area, or demolition project within an identified arsenic-contaminated area. What methods are currently being used to minimize exposure to arsenic?	Not applicable.
	(a) Are the employees working in the area aware of the hazards?	Not applicable.
	(b) Spot-check to see if they are wearing PPE and if they are part of any medical surveillance program.	Not applicable.
	(c) Are there measures to restrict access?	Not applicable.
	(d) Are there measures to prevent erosion?	Not applicable.
5	If disposal of arsenic waste was necessary, spot-check records to see how the waste was characterized, transported, and disposed.	Not applicable.
	(a) Are the contractors properly trained in hazardous waste management?	Not applicable.
	(b) Are there any outstanding areas of arsenic contamination?	Not applicable.
	(c) Are there plans to remediate them?	Not applicable.
6	Does the Partner receive annual drinking water test results?	Not applicable.
	(a) What is the procedure for informing residents of arsenic hazards in drinking water when DoN-supplied or supplied by an outside provider?	Not applicable.
ACM	Asbestos (if current inventory includes ACM in any units or structure)	
	1 Do buildings/homes with ACM exist at the property? Inventory listing and surveillance records.	See current inventory. Attachment 1
	(a) If yes, is an inventory maintained? If yes, spot-check the inventory for applicable buildings.	See current inventory. Attachment 1
	(b) Check date of last routine assessment. Ask to view the report for applicable properties following the most recent inspection.	Condition of building materials is included on the Preventative Maintenance Inspections and unit turns. Yardi tracks these.
	(c) Are tenants informed of ACM within their property? If yes, spot-check a few tenant lease agreements.	Yes Prop 65 tenant lease addendum.
2	Is there an SOP/Plan for asbestos management?	Yes there is an ACM and LBP Operations and Maintenance Plan previously submitted to the Navy.
	(a) Does the plan contain information regarding ACM management activities and how to properly manage, handle, and dispose of asbestos? Ask to review a copy of the plan.	Yes.
	(b) Are there contractor licenses and training requirements?	Yes.
	(c) Are there provisions to label known ACM materials within homes/buildings?	Yes.
3	Are there any current ACM management projects on site?	No.
	(a) Visit the areas. Are there notifications posted?	Not applicable.
	(b) Are contractors wearing PPE?	Not applicable.
	(c) Have they made appropriate provisions to prevent airborne asbestos from posing a risk to tenants?	Not applicable.
	(d) If any ACM abated, records iaw ACM Plan (Example: notifications to state/local authorities, DoN, EPA/State licenses, clearance documentation, waste shipment records, employee training/protection).	Not applicable.
4	Which personnel complete ACM management tasks (inspections, removals, etc.)?	LMH personnel complete visual inspections (PMI, Unit Turn, Walks). All testing and removal work is performed and overseen by Certified Contractors.
	(a) View a sampling of personnel training and certification requirements. If only contractor's complete work at the property, ask to view a copy of their license and training documentation retained during the last ACM removal event.	Only contractors perform removal work. There has not been a need for removal of ACM at El Centro.
	(b) Are the licenses up to date?	Not applicable.
	(c) Does the Partner conduct any on-site refresher training for employees inspecting homes for ACM?	Annual Asbestos Awareness Training is conducted for all maintenance staff. Records are maintained in the electronic learning management system maintained by the LMH Training Department.
	(d) Employee exposure assessments, worker training records, medical examination records, training records and verification of contractor compliance.	Not required as LMH employees are not allowed to disturb asbestos.

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5	Does the Partner notify residents, employees, contractors, etc. who might come in contact with ACM?	Yes. Employees are notified upon hire and during annual asbestos awareness training, contractors are notified in contracts and service agreements, residents are notified in tenant leases.
CR	Cultural and Natural Resources	
1	Do any cultural or natural resources exist at the property?	None.
	(a) Are there any old homes, sites, or other artifacts on the property that should be preserved?	None.
	(b) Are there any natural resources utilized for human consumption on the property?	None.
2	Is there an SOP/Plan for cultural and natural resource management?	Not applicable.
	(a) Does the plan contain information regarding how to properly manage cultural and natural resources?	Not applicable.
3	Have any recent construction activities uncovered any cultural or natural resources?	None.
	(a) Were activities ceased? Was the state-specific historic preservation regulatory agency contacted?	Not applicable.
	(b) Were any follow-up studies or actions required?	Not applicable.
4	How does the Partner evaluate efficient appliance and equipment to preserve natural resources such as water and power sources?	Energy conserving appliances.
	(a) Is there a protocol for purchasing energy efficient appliances?	All appliances purchased are energy star certified and also meet California requirements.
E	Emergency Planning and Community Right-to-Know Act (EPCRA) & Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)	
1	Do you know if you have to report under EPCRA?	Our inventory of hazardous materials is low and we do not need to report under EPCRA.
2	Where is the chemical inventory maintained (is it centralized or at satellite locations)?	HM inventories are maintained at the shop locations either within the storage cabinets or within the Safety Data Sheet book.
	(a) Spot-check several items on the list. Is the list current? What chemicals and/or products are missing?	Spot-check complete - no chemicals missing
	(b) Compare with a recent purchase list for the previous year. Are all items included?	(Navy)
	(c) Are quantities listed on the inventory?	Yes.
3	Where are chemicals stored on site (such as paint/removers/thinners, fluorescent bulbs, mercury-containing devices, refrigerants, PCBs, other flammable materials, batteries)?	HM are stored in cabinets and shelving systems at the shop locations.
	(a) Spot-check a few areas to see if release prevention (flammables lockers, containment) practices are in place.	Flammable lockers are in use; containment practices are in place
	(b) Are spill response materials readily available?	Each shop has at least one spill kit.
	(c) Randomly select three chemicals that you observe being stored. Are the SDS's for these products on site?	(Navy)
4	Where are the notifications to the SERC and LEPC maintained?	Not required
	(a) Spot-check the notification. Were all required notification components submitted?	Not applicable.
5	Are any chemicals stored and used over 10,000 pounds?	None.
	(a) TRI reports likely aren't required at a PPV site since the 10,000 pound threshold isn't exceeded. Pool chemicals (e.g., chlorine) are likely to be the largest volume of chemical storage. Did the Partner store more than 10,000 pounds of pool chemicals in the previous year?	No.
	(b) What's the next chemical with the highest storage? Spot-check to make sure that it's less than 10,000 pounds.	(Navy)
6	In the last year, what spills or releases occurred?	None.
	(a) Were any RQ's breached?	No.
	(b) Spot-check the RQ list to determine if the list is quickly retrievable. Does it include the appropriate RQ's for chemicals stored on site?	Not applicable.
	(c) Spot-check a few employee training records to see if they've been trained in SDS, chemical management, and chemical hazard awareness.	Records are maintained in the electronic management learning system maintained by LMH Training Department.

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HW	Hazardous Waste	Comments/Responses
1	Is there an EPA ID number?	No.
2	What is their generator status; small quantity conditionally exempt generator (SQCEG), small quantity generator, or large quantity generator?	Very small quantity generator (formerly called SQCEG). Our operations do not generate hazardous waste other than universal wastes.
3	What types of hazardous wastes are generated at the property?	Universal Wastes.
	(a) Do they include batteries, pesticides, and/or used fluorescent bulbs? If so, visit a few storage locations.	Yes. Each district shop has a storage location.
	(b) Are wastes properly stored and labeled? Are accumulation dates filled in? Are there any dented, bulging, or leaking containers?	Wastes are properly labeled and stored with date filled in; no bulging, dented, or leaking containers
	(c) Are there designated storage/accumulation locations for hazardous waste and universal waste storage?	Yes. Each district shop has a storage location.
4	Is there an SOP/Plan for hazardous waste management?	Yes. The Hazardous Materials Response Plan provides general guidance for management of Hazardous Materials. The LMH Hazardous Materials and Hazardous Waste Management Guide provides general guidelines for storage and disposal of hazardous materials and wastes.
	(a) Does the plan contain information regarding hazardous waste classification, labeling, storage, transport, and disposal requirements?	Yes.
	(b) Does the plan provide guidance for recognizing hazardous and universal waste?	Yes.
5	What is the condition of the storage location on site?	Clean and organized
	(a) Are there any open floor drains or uncurbed areas? Are there clean-up materials nearby?	No floor drains noted; no uncurbed areas noted; cleanup materials throughout
	(b) Is there evidence of any spills/leaks?	No evidence of leaks or spills noted
6	Which personnel complete hazardous waste management tasks?	Maintenance Supervisors are responsible for proper management of HM at their District Shop.
	(a) When were personnel initially trained? Spot-check a few training records to see if they've completed hazardous waste training that includes universal waste.	Personnel are trained upon hire and on an annual basis for HM management.
	(b) Does the Partner conduct any on-site refresher training?	Annually.
	(c) Does the Partner check training records, licenses, and/or certifications for contractors that may generate hazardous waste (i.e. during construction activities or pest control)?	HW generated during construction activities would be managed by certified contractors by the Construction Management Partner.
7	Where are disposal records and manifests maintained?	Disposal records are kept at the District Office by the Maintenance Supervisor.
8	Where are records for recycled materials (such as mercury-containing devices) maintained?	Recycling records are kept by the Maintenance Supervisor at the District Management Office
9	How are expired products handled at the property?	Latex paint would be the only HM that may expire (see below). Other HM is utilized before expiration.
	(a) Does the Partner utilize a disposal contractor for expired products?	Expired latex paint is recycled through PaintCare. Other products are consumed.
	(b) Which contractors are utilized for disposal of universal and hazardous waste? View disposal records to determine the types of wastes typically generated at the property.	Universal Waste Disposal Company.
10	Where is the closest HW collection center? Are there restrictions on the types and quantities of waste?	There are no HW collection centers for LMH use. Any HW would be disposed of through a HW contractor. LMH business activities do not generate HW.
LBP	Lead-Based Paint (if current inventory includes LBP in any units or structure)	
	Do homes containing LBP exist at the property?	Yes. See inventory Attachment 1. Only limited lead based paint has been identified.
	(a) If yes, spot-check the Partner's current inventory. Is the information readily available to technicians who are performing maintenance activities?	Inventory is posted on LMH Knowledge center which is available to all employees.

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		(b) Is an annual inspection required by regulation or business agreement? If not, does the Partner conduct an annual walk through to inspect for LBP conditions? How is this documented?	Paint condition is observed during PMI, unit turns, during asset/property management walks and by third party consultants (10 percent visual).
2		Is there an SOP/Plan for LBP management?	The ACM and LBP O&M plan was previously provided to NAVFAC.
		(a) Does the plan identify how to properly identify, manage, handle, abate, and dispose LBP? Does the plan specify what type of work triggers the requirement to use a certified abatement or RRP contractor?	Yes.
		(b) Are periodic lead evaluations performed? Are there records of semi-annual visual inspections with photos?	Yes. See above.
3		Were all applicable tenants notified of LBP hazards?	Tenants are notified of the potential presence of LBP in their tenant lease (pre-1978 housing only).
		(a) How does the Property Manager or leasing agent know which housing units have LBP/LP and require a lease addendum and disclosure?	The lease's have been customized by neighborhood and include a listing disclosure of available survey information.
		(b) Does the Partner have a process for leasing residences with LBP? Has Partner had legal review of the lead paint lease addendum to ensure it complies with federal and state requirements?	Yes.
		(c) Spot-check several leases for the lease addendum and disclosure / educational information. Did the tenant sign the addendum and acknowledge receiving the disclosure form and EPA pamphlet?	Yes
4		Where are records maintained for LBP activities?	Only very few locations have been identified to have LBP. Condition of paint is inspected during various Property Management/ Asset Management walks as well as third party consultant inspections.
		(a) How does the Partner know what records must be maintained?	The O&M plan identifies records that should be maintained.
		(b) Do the records include appropriate medical surveillance, inspection reports, abatement activities, clearance tests, soil sampling, paint sampling, waste characterization, and disposal records? What about abatement contractor oversight records?	Yes. See O&M Plans.
5		Which personnel complete LBP management tasks?	LMH employees are not allowed to disturb LBP.
		(a) How does Partner make sure appropriately trained technicians are assigned LBP-related maintenance activities? Spot-check recent records for training and maintenance activities. Does the PPV Partner conduct any on-site refresher training?	LMH employees are not allowed to disturb LBP. Annually, LBP awareness training is conducted.
		(b) Are personnel records such as exposure assessments, worker training records, medical examination records, training records maintained for personnel completing LBP tasks?	Not applicable.
		(c) Is contractor compliance with keeping the above personnel records verified?	Certifications of consultants/contractors are maintained.
6		Who performs LBP abatement for the project?	Abatement has not occurred at NAF El Centro. LBP has only been identified at a few locations and is beneath new paint.
		(a) How does the Partner select abatement contractors?	We have a consultant list as well as Clarke has a list of contractors. However, abatement has not occurred at El Centro.
		(b) What types of records for abatement does the Partner maintain? Spot check if any recent abatement. How were LBP materials disposed? How did the contractor determine if hazardous waste disposal was required?	Not applicable.
		(c) Are there locations with known or suspected LBP in soil?	None that LMH is aware of.
		(d) Are there results of physical assessments/visual inspections and test reports?	PMI inspection forms, unit turn forms, previous reports from the Navy.
		(e) Do abatement records, including occupant and contractor notifications; testing and analysis; correspondence and reports; project scope; materials used; and disposal records exist for any abatement areas?	Not applicable.
		(f) Are there Clearance Reports for abatement of lead-based paint or lead-based paint hazards?	Not applicable.
M		Mold	
1		Have there been incidents of mold growth at the property?	NAVFAC has access to Yardi to view water intrusion tickets and information.
		(a) If yes, visit some of the homes where mold growth has been identified, cleaned, and/or abated.	Not possible due to Covid restrictions
		(b) Are there any current homes with pending mold removal activities?	No
		(c) What are the typical sizes of mold clean-ups at the property?	Varies.
2		Is there an SOP/Plan for mold management?	Yes. Water Instrution Policy has been previously submitted to NAVFAC.

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3	(a) Does the plan contain information regarding how to properly identify, clean, and manage, mold?	Yes.
	(b) Does it include work practices for routine inspections and clean up procedures (i.e. building envelope and roof inspections)?	Yes. Inspections are completed during Preventative Maintenance Inspections on an annual basis and at unit turn.
	Are mold-affected materials and mold growth regularly inspected and documented?	Yes. See policy.
	(a) Is a procedure in place for locating and documenting new locations of mold growth?	Yes. See policy.
	(b) Visit a selection of building units to observe them for presence of mold and any mitigation completed.	Not possible due to Covid restrictions
4	How are affected Partner and contractor employees trained?	Initially at hire and annually an electronic training class is required for all employees. Additional all employees are required to attend a class in person on an annual basis.
	(a) Do training materials include the types of mold hazards, requirements for mold abatement contractors, and best practices describing how to clean and prevent mold growth?	Yes.
	(b) Spot-check a few training records to verify if employees completing mold abatement activities have completed the required training.	Training records are maintained in the electronic learning management system managed by the LMH Training Department.
5	Where are records maintained for mold inspections, sampling, and clean-up?	Records are maintained in Yardi, the District Office and by the Regional Maintenance Director.
	(a) Ask to spot-check records for a few properties. Were proper requests and approvals completed?	Water intrusion records are maintained in Yardi; a review of Yardi records indicates proper requests and approvals were completed
	(b) Is there documentation of water intrusion events, resident complaints, response actions and follow-up on incident tracking log with photos? Are there written communications regarding mold?	Communications are documented in Yardi.
	(c) Are there pre-remediation assessments, remediation work plans, and remediation project records including sampling results?	Records are maintained in Yardi, the District Office and by the Regional Maintenance Director.
	(d) Are there records of written communications with tenants regarding assessment and clean-up?	Communications are documented in Yardi.
ODS Ozone-Depleting Substances		
1	Do appliances containing ODS exist at the property?	Yes. Refrigerators and HVAC
	(a) If yes, what are the types and typical quantities of refrigerants used and stored? (i.e., R-22, R-410, and/or R-407C)	Refrigerators are serviced by vendors and are not stored on-site.
2	Is there an SOP/Plan for ODS management?	No. All work is completed by vendors.
	(a) Does the plan contain information regarding refrigerants stored and used on the property and how to properly manage, handle, and dispose refrigerants and appliances?	Not applicable.
3	Are any refrigerants stored on site?	No
	(a) Is the storage location a secure area with restricted access to only those personnel with proper certification?	Not applicable.
	(b) Are the refrigerants clearly labeled so technicians can identify the refrigerants for use?	Not applicable.
	(c) Which personnel purchase refrigerants? By what means do they approve only compliant refrigerants for purchase and use?	Not applicable.
4	When refrigerant-containing appliances/units reach the end of useful life, what is the process for disposal?	Vendors remove HVAC systems and refrigerators from the site. Refrigerants are recovered by the certified vendors.
	(a) Which on-site or off-site contractors remove refrigerants from cooling systems prior to final disposal?	Disposal and appliance vendors.

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	(b) If there is a scrap yard/warehouse on site to store appliances, visit the area to see if any refrigerants remain from the units. If not, is the Partner coordinating with an off-site contractor to remove refrigerant prior to final disposal?	No.
5	Which personnel complete refrigerant management tasks (appliance inspections, HVAC additions/removals, etc.)?	Certified Vendors.
	(a) View a sampling of applicable personnel's Section 608 Technician Certification and Training documents. This includes PPV Partner employees as well as contractors.	(Navy)
	(b) What is the process to have applicable personnel properly trained, certified, and maintain credentials? Does the PPV Partner conduct any on-site refresher training?	Not applicable.
6	Are there any units with refrigerant capacity greater than 50 lbs.?	None.
	(a) If yes, ask where does the Partner maintain the required service records of refrigerant units > 50 lbs. and spot-check a few service dates to see if they include quantity of refrigerant added and leak rates. If such appliances exist, visit the appliances to better understand its size for spot-checks at other PPV locations.	Not applicable.
PCB	Polychlorinated Biphenyls (PCBs)	Comments/Responses
1	Do buildings and/or equipment/materials containing PCB exist at the property?	None.
	(a) If yes, what types of equipment are present? If no, has a facility-wide assessment been completed to confirm the absence of PCB containing materials?	Not applicable.
	(b) Is there an inventory of any applicable materials/equipment containing PCB's and their removal actions?	Not applicable.
2	Is there a PCB management plan at the property?	Not applicable.
	(a) Does the plan contain information regarding proper handling, use, labeling, storage, and disposal procedures?	Not applicable.
3	Are applicable materials/equipment properly labeled as either containing or not containing PCBs?	Non-PCB ballasts are labeled.
	(a) Visit some locations to observe ballasts or capacitors that may be labeled "PCB-free."	No ballasts or capacitors noted
	(b) Spot-check other known PCB equipment/materials; are the PCB ML markers clearly visible?	Not applicable.
	(c) Are records available of recent sampling results of materials tested for PCB's?	Not applicable.
4	Are PCB-containing materials/equipment properly stored?	None.
	(a) Is the storage in accordance with written SOPs? Are the maintenance personnel aware of storage requirements, such as not mixing PCB-fluorescent ballasts with other waste?	Not applicable.
5	Who are Partner/contractor employees who receive training on PCB's?	Not applicable.
	(a) Ask to see a training package for proper recognition, handling, labeling, storage, and disposal practices. Is there a record that employees have routinely received training?	Not applicable.
6	Was any waste that contained PCB's shipped off site within the last three years?	None.
	(a) Who handles PCB shipments off site? Is there evidence of EPA-approval as waste handler? What records has Partner maintained as evidence of proper disposal?	Not applicable.
	(b) Was there any remaining waste that was not shipped off site? If not, why?	Not applicable.
PC	Pest Control	
1	Are pesticides and/or herbicides applied at the property?	Yes.
	(a) If yes, which contractors apply them?	Terminix
	(b) Is there an inventory of approved pesticides? If yes, spot-check to see a list of current pesticides.	Yes NOPRS AUL
	(c) Is the pesticide applicator (subcontractor) using only pesticides from the Navy's approved pesticides list?	Yes.
2	Is there an SOP/Plan for pesticide management?	There is a pest plan previously submitted to NAVFAC.
	(a) Does the plan contain information regarding how to properly manage, handle, store, apply, and dispose pesticides and herbicides?	Yes.
	(b) Is there any state-specific guidance included?	Pest Management vendors follow state requirements.
3	Are any pesticides stored on site?	LMH does not allow storage of pesticides on-site.
	(a) If yes, ask to visit the storage location. Is the storage location a secure area with restricted access to only those personnel with proper training?	Not Applicable.
	(b) Are the pesticides clearly labeled so technicians can identify the contents?	Not Applicable.
	(c) Which contractors handle disposal of pesticides? Spot-check disposal records to see recent shipments of pesticides.	Not Applicable.
4	How does the Partner determine if the contractor's pesticide license is current?	LMH obtains copies of permits during contract renewals and on an annual basis to update the on-site records.
	(a) Spot-check a few contractor pesticide applicator licenses. Are they current?	Certifications were previously submitted to NAVFAC.
5	How are Partner employees trained in pesticide awareness?	Awareness training is provided during annual environmental training. Employees are not permitted to apply pesticides.
	(a) Are any Partner employees trained to apply pesticides? Are they involved with the application, storage, or disposal of pesticides? If so, ask to spot-check a few Partner employee training records.	No.
	(b) Do training packages include emergency procedures for responding to accidental releases of pesticides?	Not Applicable.
6	Are employees and tenants notified prior to pesticide application events?	Pest Management vendors provide notification prior to application of pesticides.
	(a) What is the process to have applicable personnel properly trained, certified, and maintain credentials? Does the PPV Partner conduct any on-site refresher training?	Not applicable. LMH employees do not apply pesticides.

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7	Are there pesticide application records, including the location, pest, method of application, and type of pesticide (trade name, active ingredient, EPA Reg #, formulation, concentration, etc.)?	Pest application records are maintained by the vendor and district office.
POL		
	Petroleum, Oil and Lubricants	
	1 Are POL used at the property? If yes, what are the types and typical quantities of POL used and stored?	No. Our business operations at Yuma do not use or generate POL.
	(a) Are there maintenance garages? Storage sheds? Equipment rooms? Outdoor tanks? Visit a few areas to see example POL and locations.	None.
	(b) Does POL appear to be stored indoors? Are they stored in containment and away from drains?	Not applicable.
	(c) Is there a spill kit nearby?	Yes.
	(d) Does the Partner Maintenance Technician know what to do in case of a spill?	Yes. They are trained during annual Environmental Training.
	2 Do fuel oil storage tanks exist at the property? If yes, what are the types and sizes?	None.
	(a) Are they underground and/or aboveground?	Not applicable.
	(b) Is there storage of any product other than fuel oil? Visit a few areas to see the tanks. (Basements of homes, tank farms, and maintenance garages may have tanks).	Not applicable.
	3 Is there secondary containment for the tanks?	Not applicable.
	(a) Is secondary containment required? What is the condition of the containment? Are there cracks or gaps? Is there evidence of any leaks or spills?	Not applicable.
	(b) Are any tanks located outside of secondary containment?	Not applicable.
	(c) Is there a spill kit nearby?	Not applicable.
	4 What is the condition of piping?	Not applicable.
	(a) Is any piping leaking fuel oil? When was the most recent integrity test or equivalent environmental protection evaluation?	Not applicable.
	5 How does the Partner prevent spills?	Not applicable.
	(a) Do all tanks have spill, overfill, corrosion protection, and high level alarms?	Not applicable.
	6 Is there an SOP/Plan for tank/container management?	Not applicable.
	(a) Does the plan contain information regarding proper storage, overfill, containment, labeling, and maintenance?	Not applicable.
	(b) Does the plan contain an inventory of all storage tanks and other units > 55 gallons at the property? When was the last time the plan was updated?	Not applicable.
	7 Is an SPCC Plan required?	No.
	(a) Is there >1,320 gallons of aggregate aboveground or >42,000 gallons of aggregate underground POL storage of regulated capacity for multi-family homes and/or nonresidential buildings?	Not applicable.
	(b) If so, ask to see a copy of the plan. Was it prepared by a qualified preparer? Is it up to date? Are the procedures outlined in the plan those being followed?	Not applicable.
	8 How are Partner employees and contractors trained on tank and POL management?	Not applicable.
	(a) Does training include specifics about inspections, managing sheens, storage requirements, and oil disposal?	Not applicable.
	(b) Is there refresher training?	Not applicable.
	(c) Have there been any recent spills from storage tanks? If yes, how is the Partner preventing recurring instances? Were the cleanup and emergency procedures followed during the response? Was the Navy or Marine Corps installation Environmental point of contact promptly notified, and were they satisfied with the Partner's response? Was the PPV PM notified?	Not applicable.
	9 Where does the Partner maintain compliance recordkeeping?	Not applicable.
	(a) Do they include inventories, maintenance records, testing results, training, and facility drawings?	Not applicable.
	(b) Is there a record of the most recent training event?	Not applicable.

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P2	Pollution Prevention Act	Comments/Responses
1	What types of P2 initiatives have been completed at the property?	Solar PV systems at some locations. In addition, LMH is piloting water conservation projects at other properties with the plan to eventually roll out across the LMH portfolio.
	(a) Do they include water, energy, and waste reduction initiatives?	See above.
	(b) Does the plan include recommendations for low-flow toilets and shower heads, CFL bulbs, and programmable thermostats?	Yes. See above.
	(c) Is there potential for other unexplored initiatives?	See above.
2	What is the selection process for purchasing building repair and maintenance products (e.g. paint, sealants, etc.)?	The process is to purchase the least hazardous and non-aerosol items. Districts are responsible for purchase of their chemicals.
	(a) Does the plan contain information to purchase and use lower toxicity chemicals such as low-VOC paints and/or environmentally friendly pesticides and building materials?	There is no formal plan.
3	What types of recyclables are collected by local recycling vendors?	See hazardous waste section.
	(a) Is there potential to include additional waste streams?	None at this time.
4	Are employees trained on storage and handling provisions for chemicals to prevent a release to the environment?	Yes employees are trained annually during environmental training.
	(a) Spot-check employee training records.	Training records are kept in the electronic training management system managed by the LMH Training Department.
	(b) Spot-check storage locations to determine if proper storage techniques are utilized (e.g., flammables cabinets, containment for spills, limited exterior storage).	Proper storage techniques are being utilized
	(c) Are clean-up materials stored in an easily accessible location?	Yes each shop has a spill kit.
RAM	Radioactive Materials	
1	Has the Partner been involved in a project requiring the use of a nuclear gauge?	None.
	(a) If yes, what were the project specifics? Where was the nuclear gauge maintained? Who were the responsible contractors?	Not applicable.
	(b) Are there any new construction/renovation activities that are currently underway and available for observation? If so, are the required radiation safety procedures being followed?	Not applicable.
2	Is there an SOP/Plan for radioactive materials management?	Not applicable.
	(a) Does the plan contain information regarding NRC training requirements, work practices for proper use of gauges, and other pertinent safety information?	Not applicable.
	(b) Spot-check the review procedures for contractor's radioactive materials license, leak test results, calibration records, transportation documents, and training documents.	Not applicable.
	(c) Does the plan contain procedures for additional inspections and testing to confirm that contractors using nuclear gauges are in compliance with applicable regulations?	Not applicable.
3	Are annual reviews conducted to evaluate the radiation control program of any contractor who uses nuclear gauges on the PPV property?	Not applicable.
	(a) Spot-check a few annual reviews and records to determine the contractors and their use of gauges.	Not applicable.
	(b) Does the contractor calibrate nuclear gauge instruments annually?	Not applicable.
4	Which Partner employees receive training in radiation safety and HAZMAT?	Not applicable.
	(a) Spot-check several employee records to determine if training is current.	Not applicable.
	(b) Spot-check the following pertinent records: inspection and calibration records, training records, employee dosimetry, job request forms, records for all contracted radiation work, and the contractor's radioactive materials license.	Not applicable.
RA	Radon	
1	Have housing units at the property been tested for Radon?	NAF El Centro is located in EPA Radon Zone 3 with expected levels below 2 pCi/L. In addition previous testing completed by the Navy in the 1990s did not indicate levels above 4 pCi/L (Phase I and ECP information).
	(a) If yes, review a list of housing units that have been tested and their initial results.	Not applicable.
	(b) Were any units over 4 pCi/L? If so, did the Partner complete radon mitigation activities and retest?	Not applicable.
	(c) How often does the Partner retest?	Not applicable.
2	Is there an SOP/Plan for radon management?	Not applicable.
	(a) Does the plan contain information regarding testing requirements, notification procedures, mitigation activities, and follow-up testing requirements?	Not applicable.
	(b) Does the plan include conditions to test and retest for radon before major construction, demolition, and renovation projects?	Not applicable.
3	Who handles radon testing and mitigating activities?	Not applicable.
	(a) Is the Partner or contractor aware of EPA recommendations?	Not applicable.
	(b) Where do they place the radon test kids in the homes?	Not applicable.
4	What have been the most successful radon mitigation activities at the property?	Not applicable.
	(a) Sealing cracks? Installing fans?	Not applicable.
	(b) Have any mitigation activities been unsuccessful?	Not applicable.
5	How does the Partner communicate radon hazards, testing, and results to the residents?	Not applicable.

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	(a) View a sampling of communication documentation (pamphlets, letters, results, community programs, etc.).	Not applicable.
	(b) Do the communication documents indicate that there are additional health hazards when combined with smoking?	Not applicable.
	(c) Is there room for improvement to better inform the residents?	Not applicable.
RE	Recyclables	
1	Do opportunities for recycling exist at the property?	LMH currently recycles cardboard, metals, and universal waste. Residential recycling includes plastics, cardboard, cans, and glass.
	(a) If yes, what are the types and typical quantities of recyclables generated and stored? (e.g., plastics, yard waste, metal, electronics, etc.)	Not applicable.
2	Is there an SOP/Plan for recyclables?	The Management Plan specifies the types of recycling to be conducted.
	(a) Does the plan contain information regarding types of recyclables stored and used on the property and how to properly manage, segregate, handle, and recycle them?	There are no specific SOPs for storage of recycleables with the exception of general storm water BMPs.
3	Are any recyclables stored/staged on site or does a contractor collect them from each residence?	Both in the yard and at the residential units.
	(a) Is the storage/staging location a secure area with properly segregated and labeled areas?	Yes.
4	How are residents informed of recycling opportunities?	Move in packet information, newsletters, emails.
	(a) Does the Partner update communications if additional recycling opportunities become available?	Yes through the newsletter.
	(b) Do you offer pick up of recyclables for tenants?	The waste management company picks up recyclables.
5	Have there been any recent demolition or construction activities?	None.
	(a) Did the Partner/contractor create an inventory of materials before commencing demolition?	Not applicable.
	(b) Did the Partner/contractor remove the demolition debris to a recycling facility?	Not applicable.
CWA	Clean Water Act Compliance	
1	Do water bodies exist at the property?	Not within the lease boundary.
	(a) If yes, what are the types (lakes, rivers, and/or streams)?	Not applicable.
	(b) Are there any groundwater water wells on site utilized as a drinking water source? If so, review their recent water sample results.	Not within the lease boundary.
2	Are there any backflow preventers on the property?	Yes.
	(a) If yes, are they tested annually?	Yes.
	(b) Where is the testing information kept?	Records kept by District Management Office
3	Is there an SOP/Plan for water management?	Genral Best Management Practices (BMPs)
	(a) Does the plan contain information regarding proper storage, management, handling, and disposal of chemicals to prevent contamination of storm water runoff?	General BMPs.
	(b) Does the SOP include BMPs for proper storm water management?	General BMPs.
4	Are any chemicals stored outside?	No.
	(a) What BMPs are utilized for chemical storage to minimize water exposure?	Not applicable.
5	Are there any groundwater monitoring wells present on site?	None within our lease boundary.
	(a) If so, what contaminants have been identified as exceeding regulatory limits?	Not applicable.
6	Review recent CCR's	Complete
	(a) View a sampling of CCR's delivered from the Navy. Have they been distributed to the tenants? Were there any exceedances?	No exceedances; distributed by Housing Center
	(b) If so, what steps have the Partner and/or contractor completed to mitigate elevated levels.	Not applicable.
	(c) Were the CCR's delivered by July 1?	Not able to determine
7	How is storm water managed on site?	General storm water management by implementing recommended BMPs.
	(a) Is there a retention pond or other storm water management structure?	None.
	(b) Is there a NPDES permit? If so, spot-check the NPDES permit to review applicable requirements.	None.
	(c) If not, is there a general SWPPP/SWMP? Review the SWPPP to determine if BMPs are met for the property.	None.
	(d) Have there been any recent construction projects? Were applicable permits obtained?	None.
8	Are there test records for connections to existing Government Utilities?	None.
9	Who supplies the water for consumption?	Imperial Irrigation District